

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

JOSEPH VAN LOON *et al.*

Plaintiffs,

v.

DEPARTMENT OF TREASURY *et al.*,

Defendants.

Civil Action No. 6:22-cv-920

DEFENDANTS' CONSENT MOTION TO EXTEND THE ANSWER DEADLINE

Defendants respectfully move the Court to extend their time to respond to Plaintiffs' amended complaint by three days, or until December 9, 2022. On November 8, 2022, the Office of Foreign Assets Control (OFAC) withdrew the August 8, 2022 designation of Tornado Cash and simultaneously redesignated it under North Korea-related E.O. 13722 and under E.O. 13694/13757. *See* Press Release, U.S. Dep't of the Treasury, Treasury Designates DPRK Weapons Representatives (Nov. 8, 2022), <https://home.treasury.gov/news/press-releases/jy1087#:~:text=REDESIGNATING%20TORNADO%20CASH&text=Effective%20immediately%2C%20the%20August%208,operate%20on%20the%20Ethereum%20blockchain>. In light of the redesignation, on November 10, this Court granted Defendants' consent motion to extend their deadline to answer the original complaint until December 5. On November 22, Plaintiffs filed an amended complaint. ECF No. 21.

Defendants understand that Rule 15(a)(3) provides a 14-day deadline for answering the amendment complaint, which would make Defendants' response due on December 6. The

requested three-day extension is necessary to provide sufficient time for the relevant federal agencies and officials to coordinate their response.

Plaintiffs have informed undersigned counsel that they consent to this request.

Dated: December 1, 2022

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

ALEXANDER K. HAAS
Director

DIANE KELLEHER
Assistant Director

STEPHEN M. ELLIOTT
Senior Counsel

CHRISTOPHER R. HEALY

/s/ Christine L. Coogle

CHRISTINE L. COOGLE

Trial Attorneys

Federal Programs Branch, Civil Division

United States Department of Justice

1100 L St. NW

Washington, D.C. 20005

Tel: 202-880-0282

Fax: 202-616-8470

Email: christine.l.coogle@usdoj.gov

Counsel for Defendants